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10 **UNITED STATES BANKRUPTCY COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION**

12 In re: } CASE NO.: 8:22-bk-12142-SC
13 2ND CHANCE INVESTMENT }
14 GROUP, LLC, } DECLARATION OF KATHLEEN
15 Debtor. } A. CASHMAN-KRAMER IN
16 } SUPPORT OF MOTION FOR
17 } APPROVAL OF THREE
18 } STIPULATIONS FOR RELIEF
19 } FROM STAY:
20 }
21 } 1. (ECF #234) 37915 MARSALA DR.,
22 } PALMDALE, CA 93552, APN NO.
23 } 3023-073-011;
24 }
25 } 2. (ECF #233) 730 & 732 East 78th
26 } STREET LOS ANGELES, CA APN
27 } NO. 6023-031-025; and
28 }
29 } 3. (ECF#232) 43933 30th STREET
30 } EAST, LANCASTER, CA 93535
31 } APN NO. 3150-050-021;
32 }
33 } Date: October 18, 2023
34 } Time: 1:30 p.m.
35 } Judge: Hon. Scott C. Clarkson
36 }
37 }

38 I, Katheen A. Cashman-Kramer, declare as follows:
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40 1. I am an attorney employed of counsel at Sullivan Hill Rez & Engel, A
41 Professional Law Corporation, attorneys for the Movant, LMF 2, LP (“LMF 2, LP” or
42 “Lender”), a creditor of the debtor 2nd Chance Investment Group, LLC (“Debtor”). I
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1 am duly licensed to practice law before this court and all courts in the State of
2 California. All the information contained herein is within my personal knowledge.

3 2. I make this declaration in connection with the Lender's motion
4 ("Motion") for an order approving three (3) Stipulation For Relief From Automatic
5 Stay Under 11 U.S.C. §§ 362(d)(1) and 362(d)(2) re: (1) (ECF #234) 37915
6 MARSALA DR., PALMDALE, CA 93552, APN NO. 3023-073-011 (the "Marsala
7 Property") ("Marsala Stipulation"), (b) (ECF #233) 730 & 732 East 78th STREET
8 LOS ANGELES, CA APN NO. 6023-031-025 (the "78th Street Property") ("78th
9 Street Stipulation"), (c) (ECF #232) 43933 30th STREET EAST, LANCASTER, CA
10 93535 APN NO. 3150-050-021 (the "30th Street Property") ("30th Street Stipulation").
11 True copies of the three Stipulations are attached to the Motion as Exhibits "1" – "3".

12 3. The Debtor's schedules in this case (ECF No. 1) listed that the Debtor
13 owned an interest in the Marsala, 78th Street and 30th Street Properties, amongst
14 others. On April 13, 2023, this Court entered the order approving the retention of a
15 broker to market these and other real properties of the Chapter 11 estate. ECF No.
16 102.

17 4. My office, on behalf of Lender, timely filed a proof of claim in this case
18 on April 18, 2023, in which it listed several properties in this estate in which it held a
19 first priority secured claim, including the Marsala, 78th Street and 30th Street
20 Properties. See Exhibit "4" attached to the Motion, a true copy of the proof of claim
21 filed April 7, 2023 as Claim No. 50-1.

22 5. Starting in early July 2023 I had multiple conversations and exchanges of
23 emails Mr. Goodrich, the court-appointed chief restructuring officer for the Debtor,
24 regarding multiple properties owned by the Debtor, in which my client the Lender had
25 a first priority security interest perfected by a deed of trust.

26 6. Through these communications I learned that the Marsala, 78th Street and
27 30th Street Properties (as well as other properties) were listed for sale sometime in
28 May 2023 pursuant to an order of this Court approving the retention of a broker.

1 However, based upon the Lender's updated demands for these three properties, the
2 Debtor had either not received any offers for these three properties, or the offers
3 received were insufficient to pay all claims (including the Lender's) in full, leaving
4 nothing for the Debtor and the estate.

5 7. I personally reviewed the available on-line information for each of these
6 three properties, and it appeared from the available photographs that at least one and
7 perhaps all three properties were in need of significant maintenance and/or
8 refurbishment, which likely affected their marketability.

9 8. Thereafter, on July 11, 2023 I had a discussion with Mr. Goodrich in
10 which he stated, based upon the results of the marketing efforts, he was willing to
11 stipulate to relief from the automatic stay in favor of the Lender to allow the Lender to
12 proceed as to those three properties. Several drafts of these three stipulations were
13 circulated to Mr. Goodrich. On August 9, 2023 Mr. Goodrich signed and returned the
14 Marsala Stipulation, the 78th Street Stipulation, and the 30th Street Stipulation to my
15 office. Those three stipulations (Exhibits "1," "2," and "3" to the Motion), were filed
16 with this Court on September 12, 2023, in connection with the filing and service of
17 this Motion.

18 Executed this 13th day of September, 2023, under penalty of perjury pursuant to
19 the laws of the United States of America at San Diego, California.

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21 /s/ Kathleen A. Cashman-Kramer
22 Kathleen A. Cashman-Kramer
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 600 B Street, Suite 1700 San Diego, CA 92101

A true and correct copy of the foregoing document entitled (*specify*):

DECLARATION OF KATHLEEN A. CASHMAN-KRAMER IN SUPPORT OF MOTION TO STIPULATION FOR RELIEF FROM STAY (ECF #234)37915 MARSALA DR., PALMDALE, CA 93552, APN NO. 3023-073-011; FOR APPROVAL OF STIPULATION FOR RELIEF FROM STAY (ECF #233) 730 & 732 East 78th STREET LOS ANGELES, CA APN NO. 6023-031-025; and FOR APPROVAL OF STIPULATION FOR RELIEF FROM STAY (ECF#232) 43933 30th STREET EAST, LANCASTER, CA 93535 APN NO. 3150-050-021; MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 09/13/2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Amanda G. Billyard abillyard@bwlawcenter.com
- Stephan M Brown ECF@thebklawoffice.com, stephan@thebklawoffice.com; roslyn@thebklawoffice.com
- Kathleen A Cashman-Kramer cashman-kramer@sullivanhill.com, theresam@psdslaw.com
- Dane W Exnowski dane.exnowski@mccalla.com, bk.ca@mccalla.com; mccallaecf@ecf.courtdrive.com
- Lazaro E Fernandez lef17@pacbell.net, lef-sam@pacbell.net; lef-mari@pacbell.net; OfficeLR74738@notify.bestcase.com; lefkarina@gmail.com
- Robert P Goe kmurphy@goeforlaw.com, rgoe@goeforlaw.com; goeforecf@gmail.com
- David M Goodrich dgoodrich@go2.law, kadele@wglp.com; [lbracken@wglp.com](mailto;lbracken@wglp.com); wgllp@ecf.courtdrive.com; gestrada@wglp.com
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- Cheryl A Skigin caskigin@earthlink.net, caskigin@earthlink.net
- Richard L. Sturdevant rich@bwlawcenter.com
- United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov
- Christopher P. Walker cwalker@cpwalkerlaw.com, lhines@cpwalkerlaw.com; r57253@notify.bestcase.com
- Fanny Zhang Wan fwan@raslg.com
- Andy C Warshaw awarshaw@bwlawcenter.com, warshaw.andyb110606@notify.bestcase.com
- Jennifer C Wong bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com

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2 **2. SERVED BY UNITED STATES MAIL:**

3 On (date) 09/13/2023, I served the following persons and/or entities at the last known addresses in this
4 bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed
envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the
judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours
after the document is filed.

Debtor	2nd Chance Investment Group, LLC 600 W. Santa Ana Blvd. PMB 5045 Santa Ana, CA 92701
Residents of Real Property	Gregory Steven 37915 Marsala Dr. Palmdale CA 93552 Keisha Marie Terrell 730 E 78th St Los Angeles CA 90001 Thamar Ann Peterson 43933 30 St E Lancaster CA 93535
Judge – Courtesy Copy	Honorable Scott C. Clarkson United States Bankruptcy Court Central District of California Ronald Reagan Federal Building and Courthouse 411 West Fourth Street, Suite 5130 / Courtroom 5C Santa Ana, CA 92701-4593

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17 **3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL**
(state method)

18 for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date)

19 , I served the following persons and/or entities by personal delivery, overnight mail service, or (for those
20 who consented in writing to such service method), by facsimile transmission and/or email as follows.
Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge
will be completed no later than 24 hours after the document is filed.



22 Service information continued
on attached page

23 I declare under penalty of perjury under the laws of the United States that the foregoing is true and
correct.

24 09/13/2023 Laurel Dinkins
Date Printed Name

/s/ Laurel Dinkins
Signature

25 This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

26 *June 2012*

F 9013-3.1.PROOF.SERVICE